

Message

Burnet, Paul/PDX

From: Burnet, Paul/PDX
Sent: Monday, September 30, 2002 1:28 PM
To: 'pettit.don@deq.state.or.us'
Subject: Linnton Plywood Association comments

Post-it® Fax Note 7671		Date 9/30	# of pages 2
To DON PETTIT	From PAUL BURNET		
Co./Dept.	Co.		
Phone #	Phone #		
Fax #	Fax #		

Linnton Plywood
 Assoc. COMM

Don-

I would like to offer a few clarifications to your email.

1. As we discussed on 9/20, Outfall 6 has many stormwater sources. Linnton Plywood Association has a single catchbasin inlet on the paved area adjacent to the former dryer building. Other known inlets to this storm drain system include (based on my observations and information provided by others) several catchbasins along Highway 30, a catchbasin just north of Highway 30 and LPA, an open stream segment between Highway 30 and the railroad tracks and multiple catchbasins in the residential area of Linnton on the south side of Highway 30. Potential contributors reasonably include the City of Portland, the State of Oregon (ODOT), Burlington Northern and individual residents or contractors in the Linnton neighborhood.

My report to you of a paint thinner odor at Outfall 6, and again at the catchbasin just off Highway 30, was to convey the concept of a large drain system with multiple sources beyond the ability or responsibility of LPA to control or assess. There is no business adjacent to the catchbasin, and was no evidence of direct discharge (i.e., staining) at this point, so my presumption was that the source was likely residential, across the highway and up on the bluff overlooking LPA.

You may recall that our plan, discussed in our May 23rd meeting and outlined in the my June 28 work plan letter to you, was to reevaluate the soils beneath Outfall 6 for potential removal action. This plan recognizes the many potential other sources to Outfall 6 and was intended to provide a way for LPA to demonstrate that it had no ongoing contribution of contamination to the Willamette. The apparent presence of hydrocarbons in Outfall 6 would seem to reinforce the logic behind this plan.

The SAP prescribes sampling on Outfall 6 for TPH-Dx/O, PAHs, cadmium, chromium, lead and copper. These analytes are still consistent with the potential contaminants related to LPA, and will provide a good indication of what the entire storm drain system is delivering to the Willamette. The chance - and completely voluntary - reporting of an apparent residential release of petroleum hydrocarbon into a complex storm drain system cannot serve as justification for expanding the scope of the investigation at LPA. This would be entirely inconsistent with the Voluntary Agreement and our May 23rd meeting.

The existing project approach, discussed in the May 23rd meeting, described in our June 28 work plan and detailed in the August 2002 SAP, still provides a credible and reasonable approach to the LPA on site assessment. With the results of the October sampling from Outfall 6 a determination can be made as to whether a limited removal below Outfall 6 is appropriate. While it may be unlikely that contamination below Outfall 6, if significant, is related to LPA, this action would demonstrate that, with LPA's continued maintenance of its stormwater management system (sweeping paved areas, maintenance of stormwater filter socks), any further contamination by Outfall 6 would be clearly related to sources other than LPA.

2. Hazardous waste determinations have been and will continue to be made. Knife grinding debris will be tested as per the SAP and using generator knowledge (the only operator of the knife grinding operation is still with LPA and was interviewed regarding lubricants, abrasives and knife composition). Storm drain materials also have been tested and show no toxic characteristics (using the February 2002 catchbasin data from 2, 3 and 3A, cadmium is ND and lead averages 25 ppm, well below the "20X" rule relative to a 5 mg/l TCLP threshold; petroleum hydrocarbons are exempt; and generator knowledge that no listed or characteristic wastes have or could have entered the catchbasins). Other materials slated for removal, including those in the Outfall 5 area, have existing data regarding their characteristics but may be resampled prior to any disposal.

Sampling at LPA is scheduled for the week of October 14, tentatively October 15 and 16. We believe the current SAP is a responsible and very adequate approach to documenting environmental conditions at LPA. In consideration of the factors outlined above, your concurrence is requested.

09/30/2002

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Paul Burnet

-----Original Message-----

From: PETTIT Don [mailto:PETTIT.Don@deq.state.or.us]**Sent:** Friday, September 20, 2002 5:17 PM**To:** linply@teleport.com; Burnet, Paul/PDX; wph@tooze.com**Cc:** BLISCHKE Eric; VOSS Alicia; GAINER Tom**Subject:** Attention: Jim Staley - Comments on August 2002 SAP & Authorization to Proceed

Jim - I have reviewed the August 2002 Sampling and Analysis Plan prepared by CH2M Hill and have the following concerns:

- 1) The use of Hwy 30 catch basin silts as a reference (background) for comparison with Outfall 6 sediments is a concern because the nature of the drainage system connected to the outfall is unclear at present. Paul Burnet indicated during a telephone conversation today that solvent odors were noted during a recent visit to observe the outfall for potential sampling locations. He further indicated that he observed the odor at a local business which may be connected to the drainage system. Finally, Paul indicated that he would like to postpone the collection of Hwy 30 catch basin materials until the results of the Outfall 6 sediments analyses are obtained.

Because of the observation of new contaminants (not previously identified as potential contaminants at the site) and the potential that other properties may be connected, the evaluation of the drainage system connected to the outfall should be undertaken as a part of the evaluation. Sampling at the outfall should include volatile and semi-volatile organic compounds, and the details of the recent observations of odors should be provided (date, time, place(s), etc.) as a part of the storm drain system evaluation.

The Outfall 6 area should be observed periodically for the presence of odors related to the potential use of solvents in the site vicinity. If odors are noted again at the Outfall, the Department should be notified immediately so that an inspection can be made to determine the source. In the event an after hours release is noted, please call Oregon Emergency Response at 1-800-452-0311.

- 2) Hazardous waste determinations need to be performed for all materials to be removed from the site, including: knife grinding waste/debris; materials collected from storm drains/filters (ongoing); and catch basin 5/steam cleaner debris and soils (not during this phase).

Paul indicated that movie filming took place during August, but that the "recessed area" was not used and therefore the filling of the area was not done.

The investigation outlined in the August 2002 Sampling and Analysis Plan should proceed, incorporating

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